



DEPARTMENT OF
UTILITIES

ENGINEERING SERVICES

CITY OF SACRAMENTO
CALIFORNIA

August 13, 1998
980428:EC:rt

5770 FREEPORT BLVD.
SUITE 100
SACRAMENTO, CA
95822-2911

PH 916-433-6318
FAX 916-433-6652

Bruce A. Macler, Ph.D.
U.S. Environmental Protection Agency
Water Management Division
75 Hawthorne St., Mail Code W-6-1
San Francisco, CA. 94105-3901

**SUBJECT: COMMENTS ON THE 7/24/98 DRAFT REPORT FROM THE CALFED
DRINKING WATER ISSUES GROUP**

Dear Bruce:

We have reviewed the above draft document.

You and your group are to be complimented on putting this extensive report together in a short amount of time. The report contains substantial information and data on a number of points of drinking water use in the Sacramento-San Joaquin Delta system. Although we will focus on areas of the report where we disagree, we compliment you and the group for the overall content.

Our main concerns are the statements regarding the impact of NPDES permitted discharge on drinking water sources. There is no supporting information in the report to conclude that permitted discharges are impacting drinking water sources. There is also no support for statements that "...the CEQA process and development of NPDES permits do not adequately address impacts for drinking water."

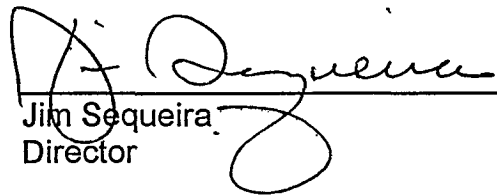
Your report mentions briefly concerns about discharges from certain waste water treatment plants (Discovery Bay, Sacramento Regional, Tracy and Mountain House) but provides no substantiation of the problem. If these discharges truly pose specific problems for water purveyors then these problems need to be resolved between the Regional Board, the discharger and the water purveyor. This process has worked well in the past. We submit that these site specific problems should not be a concern to CALFED.

We are, of course, most familiar with the Sacramento River system. The City has NPDES permits for our combined wastewater facility and our stormwater discharges. We also discharge to the Sacramento Regional County Sanitation District. I can assure you that the Regional Board fully considered the impact of our waste water on downstream drinking water intakes. These permits are fully protective of these intakes. Your report clearly shows that the Sacramento River at Green's Landing has no problem of TDS, TOC, bromides, turbidity or pathogens (those problems which are of concern to downstream water purveyors). Rather, your report clearly concludes that the problems created at the Delta Water intakes come from nonpoint sources in the watershed and salt water intrusion. We respectfully suggest that since these problems are of a broad, watershed, nature that you eliminate your suggestions which focus on NPDES permits. Rather we suggest that you urge CALFED to support comprehensive and complete watershed monitoring to identify all problems which might be impacting the beneficial uses of the Sacramento - San Joaquin Bay Delta.

The Sacramento River is already being monitored by such an effort. As you know the Sacramento River Watershed Program (SRWP) is being run, effectively, by a large and varied group of stakeholders. The monitoring program is measuring TOC, DOC, nutrients, pathogens and many other parameters of interest to stakeholders concerned about Sacramento River water quality. We respectfully suggest that CALFED continue to support the efforts of the SRWP as the most cost effective way to develop a comprehensive database and as a means to determine any impact of pollutants on beneficial uses.

Attached is a list of detailed comments.

Sincerely,



Jim Sequeira
Director

cc: Gary Carlton, EO, CVRWQCB
Bob Shanks, Sacramento Regional County Sanitation District
Rick Woodard, CALFED
Byron Buck, CUWA